

TUCKER ELLIS LLP  
Howard A. Kroll - SBN 100981  
howard.kroll@tuckerellis.com  
Steven E. Lauridsen – SBN 246364  
steven.lauridsen@tuckerellis.com  
515 South Flower Street  
Forty-Second Floor  
Los Angeles, CA 90071-2223  
Telephone: 213.430.3400  
Facsimile: 213.430.3409

Attorneys for Plaintiff  
CHRIS PRINCIPE

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHRIS PRINCIPE,  
  
Plaintiff,  
  
v.

TIMOTHY GLEN CURRY A/K/A  
TIMOTHY TAYSHUN,  
  
Defendant.

) Case No. 8:17-cv-00608 JLS (KESx)

) **SECOND STIPULATION TO  
EXTEND DEADLINE TO FILE  
DISMISSAL WITH PREJUDICE**

1 Plaintiff Chris Principe and Defendant Timothy Glen Curry, by and through their  
2 respective counsel, stipulate to extend the deadline for the parties to file a stipulation to  
3 dismiss this action with prejudice by 30 days from June 6, 2018 to July 6, 2018. This  
4 stipulation is based on the following facts:

5 1. On March 30, 2018, the parties engaged in a mediation in an attempt to  
6 resolve this dispute. The parties reached a settlement in principal and filed a notice of  
7 settlement shortly thereafter.

8 2. On April 9, 2018, in response to the parties' notice of settlement, the Court  
9 issued an Order Staying the Action Pending Final Settlement, Removing Case from  
10 Active Caseload, and Filing of Dismissal, Dkt. 48 (the "Order"). The Order provided the  
11 parties until May 7, 2018 to file a stipulation to dismiss the case. The Order further stated  
12 that if a stipulation was not filed by that date, the action would be dismissed.

13 3. The parties have worked together to draft a long-form settlement agreement  
14 memorializing the terms of their settlement in principal. Significant progress has been  
15 made, and a draft has been circulated among the parties.

16 4. Because the parties needed additional time to negotiate the written  
17 settlement agreement, the parties filed on April 30, 2018 a stipulation requesting that the  
18 Court extend the May 7, 2018 deadline set in the Order by 30 days to June 6, 2018.  
19 Dkt. 49. On May 3, 2018, the Court granted this stipulation and issued an order extending  
20 the deadline for the parties to file a dismissal in this action up to and including  
21 June 6, 2018. Dkt. 50.

22 5. Although the parties have continued their efforts in good faith to finalize the  
23 draft settlement, several circumstances have arisen that warrant additional time for the  
24 parties to finalize the agreement and file a stipulation to dismiss this action.

25 6. First, Daniel A. De Soto, counsel for Defendant, has been engaged in a trial  
26 that ended on May 18, 2018. Defendant had also been traveling, which combined with  
27 Mr. De Soto's trial schedule, has necessitated additional time for Defendant and his  
28 counsel to discuss the most recent draft of the settlement agreement and prepare proposed

1 revisions.

2 7. Steven E. Lauridsen, counsel for Plaintiff who is in charge of negotiating the  
3 agreement on behalf of Plaintiff, has an obligation out of the country and is currently  
4 scheduled to leave the country on May 26, 2018 and return on June 5, 2018, the day  
5 before the current deadline to file a stipulation to dismiss this action. Moreover, because  
6 Plaintiff frequently travels internationally as part of his business activities, the parties  
7 want to ensure that there is sufficient time for Mr. Lauridsen to review and discuss with  
8 Plaintiff any proposed revisions forthcoming from Defendant. This is particularly true  
9 given the time zone differences that would be involved during this period.

10 8. The parties therefore believe that they require an additional 30 days to  
11 finalize the terms of this written agreement in an orderly fashion.

12 9. This is the second request for an extension of the May 7, 2018 deadline. The  
13 first request was granted and extended the deadline to June 6, 2018. The parties request  
14 this extension for the above reasons to allow them to finalize settlement in an orderly  
15 fashion and not for the purpose of delay.

16 Based on the foregoing, the parties respectfully request that the Court enter an  
17 order granting this stipulation and allowing the parties until July 6, 2018 to file a  
18 stipulation to dismiss with prejudice.

19 **SO STIPULATED:**

20  
21 DATED: May 25, 2018

Tucker Ellis LLP

22  
23 By: /s/Steven E. Lauridsen

24 Howard A. Kroll  
25 Steven E. Lauridsen  
26 Attorneys for Plaintiff  
27 CHRIS PRINCIPE  
28

DATED: May 25, 2018

Law Office of Daniel A. De Soto

By: /s/Daniel A. DeSoto\*

Daniel A. De Soto

Attorneys for Defendant

TIMOTHY GLEN CURRY

\*Pursuant to Local Rule 5-4.3.4(a)(2), the filing party attests that Defendant's counsel concurs in the content of this stipulation and has authorized its filing with his electronic signature.